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2 Lisa McMahon-Myhran, WSB #27559
3 Maya Swanes, WSB #41181
4 Robinson Tait, P.S.
5 710 Second Avenue, Suite 710
6 Seattle, WA 98104
Phone: 206-676-9640
Fax: 206-676-9659

7 UNITED STATES BANKRUPTCY COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 In Re: BANKRUPTCY NO. 08-17351-TWD

10 JOSALYN CONLEY AND KENNETH CONLEY, CHAPTER NO. 13

11 Debtors.

12 STIPULATION RESOLVING MOTION FOR
13 SANCTIONS

14 DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR SECURITIZED
15 ASSET BACKED RECEIVABLES LLC TRUST 2007-BR4 and its successors and assigns' (hereinafter
16 "Secured Creditor") whose loan is serviced by Rushmore Loan Management, LLC and the Debtors
17 through their respective undersigned counsel hereto agree to entry of an Order with the following terms:
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19 STIPULATED FINDINGS

20 1. Secured Creditor holds a lien against the parcel of real property commonly known as
21 2020 Shattuck Ave S., Renton, WA 98005. The lien is secured by the January 22, 2007
22 Deed of Trust recorded with the King County Recorder's office as document number
23 200702000512, and the assignment of Deed of Trust recorded as document number
24 20080327001981.
25
26 2. Debtors' loan is contractually current through December 2013, and due for the January
27 2014 payment.

28 ON THE BASIS OF THE FOREGOING STIPULATED FINDINGS, THE PARTIES AGREE
THAT THE COURT MAY ENTER AN ORDER WITH THE FOLLOWING TERMS:

STIPULATION FOR ADEQUATE PROTECTION - 1
60430-0002-BK-1

Law Offices of
ROBINSON TAIT, P.S.
710 Second Avenue, Suite 710
Seattle WA 98104
(2 0 8) 6 7 6 - 9 6 4 0

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3 1. The Debtor shall maintain payments directly to Secured Creditor c/o Rushmore Loan

4 Management Services, servicer for Secured Creditor and its successors and assigns

5 beginning January 1, 2014.

6 2. All corporate advances or expenses, corporate suspense accounts, late fees, statutory fees,

7 legal fees, escrow advances, or any other fees, charges, or expenses that the holder of the

8 mortgage loan or the master servicer, the servicer, the sub-servicer, the default servicer,

9 or any other entity added to the account of the Debtors, but which have not been applied

10 for nor approved by the Court, after proper notice and hearing and unless properly

11 noticed and included in a supplemental proof of claim, are forever cancelled and

12 discharged as of the date of the entry of this Order. Any information to the contrary that

13 was reported to the credit bureaus has been or will be corrected.

14 3. In the event that the holder of this mortgage, the current servicer or any subsequent

15 assignee or holder of the mortgage debt attempts to collect any of these discharged fees

16 or expenses, the Debtors shall have the right to pursue a proceeding before this Court for

17 contempt and appropriate sanctions and such other state and federal statutory remedies as

18 may be available to the Debtors and this Court specifically retain jurisdiction over such

19 claim or claims.

20 4. Secured Creditor agrees to reimburse \$726.10 in attorneys fees and \$235.00 in costs to

21 Debtors' counsel.

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25 Presented by:

26 /s/ Lisa McMahon-Myhran

27 Lisa McMahon-Myhran, WSB #27559
28 Jessica Bandlow, WSB #46026
ROBINSON TAIT, P.S.

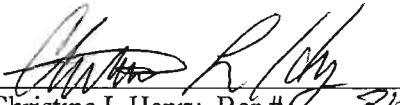
Attorneys for DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR SECURITIZED ASSET

STIPULATION FOR ADEQUATE PROTECTION - 2
60430-0002-BK-1

Law Offices of
ROBINSON TAIT, P.S.
710 Second Avenue, Suite 710
Seattle WA 98104
(2 0 6) 6 7 6 - 0 8 4 0

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2 BACKED RECEIVABLES LLC TRUST 2007-BR4 and its
3 successors and assigns

4 Agreed as to Form and Content; Notice of Presentation Waived:
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7 Christina L Henry, Bar # 31223
8 Attorney for Debtors

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STIPULATION FOR ADEQUATE PROTECTION - 3
60430-0002-BK-1

Law Offices of
ROBINSON TAIT, P.S.
710 Second Avenue, Suite 710
Seattle WA 98104
(206) 676-9840